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BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

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Postal Rate and Fee Changes, 2001

Docket No. R2001-1

OFFICE OF THE CONSUMER ADVOCATE MOTION TO COMPEL PRODUCTION OF DOCUMENTS REQUESTED IN OCA/USPS-7 (October 23, 2001)

Pursuant to Rule 21 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate (OCA) hereby moves to compel survey results requested in interrogatory OCA/USPS-7, filed September 28, 2001. In accordance with the Commission's Rules 26(d) and 27(d), the interrogatory is reproduced below.

OCA/USPS-7. The following interrogatory refers to a case study, "Pushing the Envelope, The U.S. Postal Service Digs Deep To Deliver What Customers Really Want," by Francia Smith, Lizbeth Dobbins, and Janet Tonner. A copy of the article is attached. The case study indicates that "Postal Service managers have access to as many as 180,000 business-satisfaction surveys and 200,000 residential surveys every three months. And while customer satisfaction surveys have been around for a long time, what makes these different – and a great model for any service company – is that the results are linked by ZIP Code to precise locations and operations at the Postal Service."

- (a) Please provide copies of the 180,000 business-satisfaction surveys and 200,000 residential surveys that are performed every three months.
- (b) For each year and each three month period in FY 2000 and FY 2001, please provide by postal region, a copy of the survey results referred to in the case study.

In response to part (a) of OCA interrogatory 7, the Postal Service provided copies of the blank survey forms, one entitled "U.S. Postal Service Customer Satisfaction Survey" (the Residential customer survey, Attachment A), the other entitled "U.S. Postal Service Business Customer Satisfaction Survey" (the Business customer survey, Attachment B). For the most part, the Postal Service objected to filing any survey results, alleging that most of the results were irrelevant. The Postal Service expressed willingness to submit survey results that reveal "customers' experiences with specific classes of mail," but only subject to protective conditions. The Postal Service takes the position that survey results that are not class-specific are "irrelevant to the determination of rates and fees" and "to a proceeding under 39 U.S.C. §§3622 and 3623."

OCA vehemently disagrees that only the class-specific survey results are relevant to the current rate proceeding and asks the Presiding Officer to direct the Postal Service to submit most of the information that the Service is currently withholding. The Postal Service refuses to provide *any* of the responses collected in the Residential customer survey, and only a small fraction of the information collected in the survey of Business customer satisfaction.

Most of the questions posed in the Residential customer survey are concerned with inquiries about the quality of services being provided by the Postal Service. For

[&]quot;Partial Objection of the United States Postal Service to the Office of the Consumer Advocate's Interrogatory OCA/USPS-7 and Joint Motion for Protective Conditions," filed October 9, 2001 (hereinafter referred to as "Objection") at 1.

Objection at 3.

³ *Id*, at 2.

⁴ *Id.* at 3.

example, question 1.a. inquires about the accuracy of delivery to the correct address, while question 1.b. asks whether mail has been delivered in good condition. Question 2.b. formulates 1.b. somewhat differently, asking whether the respondent has received damaged mail within 30 days of answering the question. Number 5 poses questions concerning ease of buying stamps, ease of mailing letters, and ease of mailing packages. Questions 9 and 11 inquire about the helpfulness, clarity, and courteousness of window clerks. Questions 21-23 ask about overall Postal Service performance.

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Like the Residential customers survey, many of the Business survey questions measure customer satisfaction with postal employees (Question 1.c., f., g., h., and Question 13.c.), the accuracy of mail delivery (Questions 1.k. and 5.a.), the convenience of conducting business at a postal retail facility (Question 13.a. and b.), the quality of mail processing, transportation, and delivery (Question 1.l., Question 3, and Question 4.b.), the accuracy of Postal Service accounting practices (Question 10), the quality and accuracy of communication with the Postal Service (Question 17), the speed and reliability of mail delivery (Question 19), and the general perception of quality about the Postal Service (Questions 26 and 29).

Residential and Business customers' perceptions of the efficiency, accuracy, and convenience of the Postal Service are highly relevant to a number of issues that must be resolved by the Commission. Foremost among them is the level of the contingency that will be recommended. One of the ten "Significant Possible Adversities" proffered by witness Tayman as a justification for his proposal to add a three percent contingency to the revenue requirement is the "variation between projected and actual mail volume

and revenue," a variation that he characterizes as "inevitable." He notes that revenue variance from the Docket R2000-1 estimate was more than two percent. Indeed, OCA concurs that Postal Service mis-estimates of volumes and revenues are a source of concern. OCA, however, strongly disagrees that such variations are "inevitable."

In Docket No. R2000-1, as in the current proceeding, witness Tayman offered revenue shortfalls and disappointing volume growth as bases for establishing the R2000-1 contingency at 2.5 percent.⁶ OCA witness Burns challenged the revenue and volume contentions of witness Tayman on the ground that such matters are controllable by the Postal Service, and therefore, not proper justifications for a higher contingency.⁷ Witness Burns stressed that, "The Postal Service can influence volumes by improving service" In his direct testimony, witness Burns testified that:⁸

The purpose of a contingency is to cover expense[s] which are unexpected . . . and are uncontrollable After all, honest, efficient, and economical management will make every reasonable effort to control those costs that are foreseen and foreseeable.

Witness Burns' testimony conforms to the Commission's view of the purpose of the contingency. In its Docket No. R2000-1 opinion, the Commission reiterated the legal standard for assessing the need for a particular level of contingency that it had articulated years before in Docket No. R84-1:9

⁵ USPS-T-6 at 61.

⁶ USPS-T-9 at 43 (R2000-1).

Tr. 22/9735 (response of witness Burns to interrogatory USPS/OCA-T2-8; R2000-1).

ld. at 9710 (OCA-T-2 at 3). As may be seen from the quoted passage, witness Burns invoked the "honest, efficient, and economical management" proviso of the Postal Reorganization Act. OCA fully intends to invoke this proviso in the current proceeding in connection with customer satisfaction and quality of service issues.

⁹ PRC Op. R2000-1, para. 2152.

the [§3621] provision is intended to protect against unforeseeable events, not capable of being prevented through honest, efficient, and economical management, and which might have a significantly adverse impact on the financial position of the Service or upon its operations.

Through discovery, OCA is attempting to develop evidence on the level of customer satisfaction both with particular classes and services (that relate directly to the issue of markup) and with the Postal Service generally. The latter type of information – general and diverse customer satisfaction/dissatisfaction with the Postal Service – is material that OCA intends to incorporate into its own testimony relating to the contingency. While the Postal Service may wish to neglect such information in the development of its contingency testimony, its efforts to prevent the OCA from so doing should not be condoned.

OCA further notes that customer perceptions about the Postal Service and its efficiency, accuracy, convenience, and courtesy undoubtedly will influence the growth or diminution of volumes in the test year. Yet Postal Service witness Tolley fails to give these matters explicit treatment in his volume estimation procedures. This may very well contribute to the revenue shortfall noted by witness Tayman and cited above. It cannot be gainsaid that the requested survey results would be relevant to an evaluation of the Postal Service's volume and revenue estimates in this proceeding, as well as rate design and application of pricing criteria.

It is significant that the Postal Service does not allege in its Objection that production of the requested survey responses is burdensome. Perforce, when one weighs the relevance and importance of the cited survey responses to OCA testimony against the Postal Service's bare assertion of irrelevance, the balance tips heavily and clearly in the direction of production.

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When one applies the standard for relevance articulated by the Postal Service itself, it is apparent that some of the Residential customer survey information is clearly class-specific and relevant. For example, question 2 asks Residential customers about several different "situation[s]" concerning mail delivery:

- 2.b. "Received statements, bills, or correspondence addressed to a previous resident."
- 2.d. "Received magazines or newspapers later than expected."
- 2.e. "Received advertising mail too late to take advantage of coupons or sales."

It is hard to imagine that residential customers responding to these questions would have had any classes of mail in mind other than First Class in answering 2.b., Periodicals class in answering 2.d., and Standard A in answering 2.e. These responses should certainly be provided.

With respect to the Business customers survey, Question 6, which is limited to receipt of mail via a post office box, is associated with a unique service, and therefore relevant even under the Postal Service's view of relevance.

For the reasons presented above, the OCA respectfully requests that the Postal Service be directed to provide survey responses to the following Questions:

Residential Customer Survey

Question 1.a. – g.

Question 2.a. - h.

Questions 3 and 4

Question 5.a. - k.

Questions 6 –7 (OCA anticipates using this information in its direct testimony).

Question 9.a. – f.

Question 10

Question 11.a. - j.

Question 15a, and b.

Question 17 (OCA anticipates using this information in its direct testimony).

Question 18.a. - e.

Question 19

Question 20.a. – c.

Question 21

Question 22.a. - h.

Question 23

Question 33

Business Customer Survey

Question 1.a. - h. and k. and l.

Question 2.a. – d.

Question 3.a. – c.

Question 4

Question 5.a. - b.

Question 6, including a. and b.

Question 8a. - c.

Question 10

Question 13a. - c.

Questions 14 –16

Question 17.a. - d.

Question 18

Question 19.a. - c.

Question 26

Questions 29 - 31

Respectfully submitted,

Shelley S. Dreifuss

Acting Director

Office of the Consumer Advocate

Shelly A. Drufussi

1333 H Street, N.W. Washington, D.C. 20268-0001 (202) 789-6830; Fax (202) 789-6819

U.S. Postal Service Customer Satisfaction Survey

To be completed by an individual knowledgeable about the household's mail. Please base your answers only on your household's direct experience during the past 30 days — not on what you have heard from others, experienced in the workplace, learned from the news, or on experiences older than 30 days. Your answers to these questions will be kept confidential and will only be used to identify groups of similar respondents for statistical purposes.

Please follow the steps below carefully when completing this survey:

- Use a blue or black ink pen that does not soak through the paper.
- Make solid marks that fit in the response boxes. (Make no stray marks on the survey.)

RIGHT WAY ▶	X	98	WRONG WAY ▶	4	98
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Mail You Receive

4	Based on your experiences during the past 30 days, please delivery. (PLEASE MARK ONE ANSWER BY PUTTING AN "X" IN						ects of y	our mail
	delivery. (Please make one answer by Putting an X in	THE APPROPRIATE B	Excellen	Very	Good	Fair	Poor	Don't Know
١	a. Delivery of mail to the correct address		🗀	$\dot{\Box}$	Ò			
	b. Delivery of mail in good condition	***************************************	🗆					
	c. Delivery of mail about the same time each day		🗖					
	d. Carrier was professional and courteous		🗖					
	e. The security of your mail (that it will remain unopened theft and/or loss)		🗖					
ŀ	f. The security of mail in your mailbox		🗆					
	g. Overall quality of your mail delivery service		🗖					
	During the past 30 days, have you experienced the follow: (IF "No," MARK THE "NOT AT ALL" BOX. IF "YES," MARK THE	ing situation with le box Indicate	Postal Ser IG HOW M	ANY TIM	es.)	-	More	
	During the past 30 days, have you experienced the follow (if "No," MARK THE "NOT AT ALL" BOX. IF "YES," MARK THE In the past 30 days?	ing situation with l	Postal Ser NG HOW M	vice del ANY TIM Not al all	es.)	o your re		Don't Know
	(IF "NO," MARK THE "NOT AT ALL" BOX. IF "YES," MARK TH	E BOX X INDICATIN	NG HOW M.	Not at	es.)	2-3	More than 3	Don't
	(IF "NO," MARK THE "NOT AT ALL" BOX. IF "YES," MARK THE In the past 30 days?	E BOX X INDICATIN	NG HOW M.	Not at	es.)	2-3	More than 3	Don't
	(IF "NO," MARK THE "NOT AT ALL" BOX. IF "YES," MARK THE In the past 30 days? a. Received mail intended for a different address	E BOX X INDICATION	ident	Not at all	es.)	2-3	More than 3	Don't
	In the past 30 days? a. Received mail intended for a different address b. Received statements, bills or correspondence addressed	e BOX X INDICATION	ident	Not all all	es.)	2-3	More than 3	Don't
	In the past 30 days? a. Received mail intended for a different addressb. Received statements, bills or correspondence addressec. Received damaged mail	e BOX X INDICATION	ident	Not all	Once	2-3	More than 3	Don't
	In the past 30 days? a. Received mail intended for a different address b. Received statements, bills or correspondence addresses d. Received magazines or newspapers later than expected	d to a previous resident	ident	Not all all all all all all all all all al	Once	2-3	More than 3	Don't
	In the past 30 days? a. Received mail intended for a different address b. Received statements, bills or correspondence addressed. c. Received damaged mail	d to a previous res	ident	Not at all all all all all all all all all	Once	2-3	More than 3 times	Don't

In the past 30 days, what happened if no one was at hom when your Postal carrier had a package to deliver to your household? (MARK ONLY ONE-) You got a notice of attempted delivery and you picked up your package at the post office you requested redelivery Carrier left the package with someone (Examples: neighbor, rental office, etc.) in a locked box or locker for you (Examples: on porch, near mailbox, etc.) Not applicable, no package received (Go to Q #5) Not applicable, someone was home (Go to Q #5) Thinking about your answer to question #3, please rate how well this delivery method met your needs. Very Excellent Good Good Fair Poor Know Excellent Good Good Fair Poor Know	THAT APPLY.) Post office counter Grocery store or other store Vending machine From carrier (where available) ATM Order by Mail Order by Telephone (1-800-STAMP24) Order by Internet (Stamps On Line) How do you typically mail a package with the Postal Service? (MARK ONLY ONE.) Bring to post office counter Use self-service equipment at post office (vending, scales) Leave for carrier
Mail You Send 5 Based on your experiences in the past 30 days, please rate the U.S. Postal Service on each of the following: Excel- Very 100 1	es Not Applicable
mail, etc.)	More than 5 times During your most recent visit to the post office Yes No Know

During your most recent visit to the post office, how long did you wait in line? (MARK ONLY ONE.) No wait/No line Less than 1 minute 1 - 3 minutes 4 - 5 minutes 6 - 10 minutes More than 10 minutes Don't know/Can't recall Based on your experiences during the past 30 days,	In the past 30 days, has anyone in your household completed a change-of-address card so that your mail would be forwarded to a different address, including a temporary or vacation address? Yes, for an individual Yes, for the household No (Go to Question # 16) If "Yes," please provide the 5-digit ZIP Code you forwarded your mail from
please rate the post office you have visited most often on each of the following Excel- Very Don't lent Good Good Fair Poor Know V V V V V V V V V	a. Delivery of forwarded mail within reasonable number of days
h. Signs and displays were helpful	Thinking of your most recent contact, how did you contact the Postal Service? (MARK ONE.) Telephoned post office Telephoned a toll-free number Written correspondence E-mail/Internet Went to Post Office Spoke with carrier Thinking of your most recent contact, rate the Postal Service on: Excel- Very lent Good Good Fair Poor Know
Other Postal Services 13 Please mark the one response which best describes where you normally receive your mail. (MARK ONLY ONE.) Individual mail slot or mailbox at your door Individual curbside mailbox Mailbox within cluster of boxes inside a building Mailbox within cluster of boxes outside a building or home In a box at a post office (P.O. box) Rented box somewhere other than at a post office	a. Ease of reaching someone who could help

*

Please rate the Postal Service advertising you have seen or heard in the past 30 days?	Demographics 24 Do you operate a business from your home? Yes No
Have you accessed any Postal Service Internet page in the past 30 days such as www.usps.com? Yes No, have not accessed site in past 30 days (Go to Q#21) No, have no Internet connection (Go to Q#21) Excel- Very lent Good Good Fair Poor Know a. Usefulness of site	Is anyone in your household employed by the U.S. Postal Service or by a national company which specializes in shipping or delivery of mail or packages? Yes No About how many packages or pieces of mail do you send in an average month using the Postal Service? (MARK ONE) 0-10 pieces 21 or more pieces 11-20 pieces Don't know Which do you use more frequently to mail packages? Postal Service Other delivery service Have you purchased any merchandise over the Internet in the past 30 days? Yes No
Overall Performance 21 Thinking about all aspects of U.S. Postal Service performance during the past 30 days, please rate the service you have received. Very Excellent Good Good Fair Poor Know V V V V V V V V V V V V V V V V V V V	What is your age? Under 25 years
Some About Scme- Much what the what Much Don't better better same worse worse know a. Waiting time in line	Would you allow the Postal Service to contact you via e-mail with additional questions to improve service? (INFORMATION WILL NOT BE SHARED OUTSIDE THE POSTAL SERVICE.) Yes What is your e-mail address? No Additional comments: Is this a: Compliment Suggestion Problem
Thinking about the past 30 days, how satisfied are you with the U.S. Postal Service? Very Somewhat Somewhat Very Don't Dissatisfied Dissatisfied Know	Thank you for completing this survey!

Please return completed survey to: The Gallup Organization • P.O. Box 82606 • Lincoln, NE 68501-8806

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Survey Instructions

Please follow the steps below carefully when completing this survey.

- •Use a blue or black ink pen that does not soak through the paper.
- •Make solid marks that fit in the response boxes. (Make no stray marks on the survey.)

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X	9	8		P	([]	9	4

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	Providing products and is a services to meet the needs of your business					
8.44	Having rules and regulations that are easy to understand, Having employees who miterpret rules and regulations consistently					
	Providing products and sessions services that are a good value for the price sessions. Notifying your business of					
	changes to rules and regulations		4, (-7)			
	mailing needs					
	knowledgeable about 11 S. Postal Service products and services	. 🗆 [)]	7	Ji	

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Figure 1
Cost Office your plasmass
C. Business Mail Entry (Emit) (BMEU)
d Rates and Classification
Center: □ □ □ □ □ □ □ □

Mail Your Business Receives	Mail Your Business Sends
Thinking about mail delivered to your company	8 Thinking about the mail your company sent through
by a U.S. Postal Service carrier during the past 30 days, how would you rate the U.S. Postal	the U.S. Postal Service in the past 30 days, how
Service on	would you rate the U.S. Postal Service on
	Outrolog Mail
a. Time of day mail is 7 7 7 7 7	a. Convenience of mail pick
delivered to your location 🗆 🗀 🗀 🖂 🖂 🖂	up times
b. Consistency of delivering mail to your location within	times
a half hour of the same time	c. Number of pick up times
each day	9 Based on your company's experience in the past
c. Appearance of your letter	30 days, please rate the following U.S. Postal Service products and services your business used
During the past 30 days; did you typically receive your	for sending mail.
mail at this location	Control of the contro
□ Before noon	
☐ After noon ☐ Carrier does not deliver mail to this location 2.	a Priority Mail.
Don't Know	6. Express Mail
5 During the past 30 days	d. Discounted First-Class Mail
(if "No," mark the "Not at all" box If "Yes"	(presorted bar-coded)
MARK THE BOX INDICATING HOW MANY TIMES.)	e. Periodicals (e.g., magazines, newspapers)
How often in past 30 days?	f. Standard Mail (A) (advertising)
a. Have you received mail intended	g. Standard Mail (B) (parcels) 🔲 🔲 🔲 🔲 🔲 🗒
for a different address?	
mail?	During the past 30 days, have you experienced errors by the U.S. Postal Service in processing money in
Ouring the past 30 days, has any of your business's	your postage account(s)?
mail been delivered to a Postal Service post office	Never
box?	Once a week or less 2 to 3 times a week
	☐ Nearly every day
If "Yes," have the following occurred in the past 30 days? (If "No," MARK THE "NOT AT ALL? BOX,	□ Not Applicable
"F"YES," MARK HOW MANY TIMES.)	Post Office Experiences
	During the past 30 days, how many times did you visit
Hem often in past 30 days?	a post office for business needs?
posted time	☐ Not at all (please go to Question #14)
b. Received mail not addressed to your post office box	☐ 1-2 times = 1
	☐ More than 5 times
Does your business use caller service for receiving mail? Yes No	What is the ZIP Code of the post office you visit most?
Li Yes Li No	
	□ Don't know

Please rate the post office you visit most on	Bulk Rate/Discounted Mail
a. Convenience of hours when post office is open	In the past 30 days, has your company sent out any bulk rate or other discounted mail, such as presorted or prebarcoded mail? (PLEASE INCLUDE MAIL SENT THROUGH A THIRD PAKTY/VENDOR) The second of the content of the
Contact with the USPS If the past 30 days, have you contacted the U.S. Postal Service about any aspects of your service? Yes No (please go to Question #18.) Who was the contact with? (MARK ALL TRAY APPLY) Postal Carrier S. Account Representative; Consumer Affairs Office Personnel at Business Mail Entry Unit	a. Providing you with the equipment needed for preparing mailings
Personnel at your local postal office National Service Center (Call Center) Postmaster Postal Business Center Other What was the purpose of the contact? (MARK ALL THAT APPLY) To request information about U.S. Postal Service products or services To seek elarification/information on U.S. Postal Service rules or regulations To seek assistance on a business mailing problem To make a complaint	Corporate Officer/Owner Financial Operations Mail Operations Administrative/Clerical Other The following are business purposes for sending mail via the U.S. Postal Service. Please indicate which three business purposes best describe how the mail is used by your business. (MARK UP TO THREE THAT APPLY) Payments Payments Responses
Please rate the U.S. Postal Service on	Communications International Statements International Direct Mail Direct Mail Magazines Statements Retail products & services Two-Day Delivery Standard Delivery (parcels) Bills and Statements (e.g., accounts, invoices); Overnight Package Delivery (e.g., Express Mail) Reduced rate packages (library rate) Other 22 Please estimate your location's annual expenditures on U.S. Postal Service products and services. Less than \$1,000 \$50,000 - \$99,999 \$100,000 or more
	Don't know please continue on next page

Do you prepare or send mail for other c		During the past 30 days, have you experient serious problems with Postal Service produservices? (IF "No," MARK THE "Not AT ALL"	Giggs (Sec.) Poxistic
24 Do you contract with an outside compa house, mailing service, or printer) to primail for your company?	epare or send	"YES," MARK THE BOX INDICATING HOW MANY. Not at all the second of the s	et (DAP)
☐ Yes ☐ No (please g	o to Question #26.)	☐ ∠stimes = 1	
How much of your mail is prepared and outside company?	or sent by an	☐ More than 3 times ☐ 1 Don't know (4.5 ± 4.7 ± 5.5 ± 5.4 ±	
□ 0%-25% □ 51%=7数		0 F : Yes, " please describe problem(s): ####	
* 26% - 50% - 76% - 100°		<u></u>	🖹
Overall Performanc	e		
26 Thinking about all aspects of U.S. Post performance during the past 30 days, p service your business has received?			
Extellent No Second Address			
A P Very Good To the Section of the			
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Service And the Processing of		products and services it provides to your co	11111
B. Express Mail			
Standard Mail (A) (advertising)			
28 Would you recommend the following p	roducts and		
services to your business associates (77 77	
a, Priority Mall			
d Standard Mail (A) (advertising)			
TO STANDARD MAIL (D) Charled 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1			

Your answers to these questions will be kept confidential and will only be used to identify groups of similar respondents for statistical purposes.

Thank you for completing this survey!

Please return completed survey to: The Gallup Organization P.O. Box 82570 Lincoln, NE 68501-9571

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with Rule 12 of the rules of practice.

h'Enri Whitseyjohnsor

Washington, D.C. 20268-0001 October 23, 2001